

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: MEDTRONIC, INC,
IMPLANTABLE DEFIBRILLATORS
PRODUCTS LIABILITY LITIGATION

MDL No. 05-1726 (JMR/AJB)

This Document Relates to All Actions

**MEDTRONIC INC.'S MOTION TO DISMISS PLAINTIFFS' MASTER
CONSOLIDATED COMPLAINT FOR INDIVIDUALS**

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b), Medtronic, Inc. ("Medtronic") hereby moves this Court to dismiss Plaintiffs' Master Consolidated Complaint for Individuals ("Master Complaint") in its entirety.

In support of this Motion, Medtronic submits the attached Memorandum of Law and the Affidavit of Lori G. Cohen.

Dated: March 15, 2006

MEDTRONIC, INC.

By: /s/ Lori G. Cohen

Lori G. Cohen
Jay B. Bryan
GREENBERG, TRAURIG, LLP
The Forum – Suite 400
3290 Northside Parkway
Atlanta, GA 30327
T (678) 553-2100
F (678) 553-2212

*Co-Lead Counsel for Defendant
Medtronic, Inc.*

Michael K. Brown
REED SMITH LLP
355 South Grand Avenue
Suite 2900
Los Angeles, CA 90071
T (213) 457-8000
F (213) 457-8080

*Attorneys for Defendant
Medtronic, Inc.*

Donald Lewis
Tracey Van Steenburg
Halleland Lewis Nilan & Johnson, P.A.
600 U.S. Bank Plaza South
220 South Sixth Street
Minneapolis, MN 55402-4501
T (612) 338-1838
F (612) 338-7858

*Liaison Counsel for Defendant
Medtronic, Inc.*

Stephen J. Immelt
Hogan & Hartson, LLP
111 South Calvert Street
Baltimore, MD 21202
T (410) 659-2700
F (410) 458-5198

*Co-Lead Counsel for Defendant
Medtronic, Inc.*